Exhibit L

(Exhibit Number 5001 was admitted into evidence.) 02:14:04

BY MR. NORTH:

Q. Is this Dear Doctor letter -- oh.

MR. NORTH: Could we display this to the jury, Your Honor? 02:14:15

THE COURT: Yes.

BY MR. NORTH:

Q. Does this specifically advise physicians what has been changed in the instructions for use based upon the clinical reports? 02:14:32

A. Yes, it does. It indicates that -- it actually summarizes the changes to the IFU and indicates how the warnings and the precautions in the safety sections of the IFU were updated specifically to identify the risks of fracture and migration and some other procedural information that we wanted to make 02:14:57 the physicians aware of that was important.

Q. Was this the only communication the company made regarding the Recovery filter and possible migration incidents to physicians?

A. I don't recall if there was some individual communications 02:15:22 with physicians but we did do a second letter later, a Dear Colleague letter, that also went out to physicians.

MR. NORTH: Let's look at 5247 if we could.

BY MR. NORTH:

Q. Do you recognize this document? 02:15:53

A. Yes. That's the Dear Colleague letter that I just mentioned. 02:16:05

Q. And before you sent -- the company sent this letter out, did you have discussions with the FDA about the fact that the company was going to send this letter out to physicians? 02:16:14

A. Yes, we did.

MR. NORTH: Your Honor, at this time we would tender 5247.

MR. JOHNSON: Your Honor, we did not see this on their list -- oh. Never mind. I apologize. We don't have any objection. 02:16:31

THE COURT: All right. 5247 is admitted.

(Exhibit Number 5247 was admitted into evidence.)

MR. NORTH: Could we publish it?

THE COURT: You may. 02:16:44

BY MR. NORTH:

Q. If we would look in the first sentence at the paragraph that begins "Over the past two years." And going to the end of that paragraph. Could you tell us what the company advised physicians about with regard to the Recovery filter here? 02:17:21

A. Yes. We advised them about the risk of filter migration and that some of them had been associated with interventions and death and we shared that although those events had occurred, they were below the rates that had been reported in the Society of Interventional Radiology guidelines and that the 02:17:48

A. Yes. We noted that the patient should be returned to their anticoagulation therapy as soon as it was deemed safe. 02:19:46

Q. And turn to the next page, page three of this document. Did the company also encourage physicians to report any adverse events both to the company and to the FDA? 02:20:07

A. Yes, we did. We provided the FDA contact information and our contact information and reiterated to the physicians that it was very important for them to report the events to both us and to the FDA.

Q. Now, when the company, during your time there, would send out a letter like this, a Dear Colleague letter or a Dear Doctor letter like the previous one we saw, what sort of steps did the company take to ensure that this got the widest distribution or dissemination possible? 02:20:28

A. We looked at our entire customer database of anyone that had purchased the product and sent the product out to those physicians and we tracked the delivery of those letters to make sure that they were delivered. 02:20:47

Q. Now, over the course of this time period in the late 2004, early 2005 time frame, were you having a number of conversations with the FDA? 02:21:24

A. Yes, I did. I had frequent communications with the FDA.

Q. And did you have communications that specifically discussed the reports of migration with regard to the Recovery filter that the company was receiving? 02:21:41

A. Yes, I did. I had frequent phone contacts with the FDA where --

MR. O'CONNOR: Objection, Your Honor. This is hearsay.

THE WITNESS: I have contact had reports -- 02:21:52

THE COURT: Hold on, please.

Overruled so far. There has been nothing said about the content of the conversations.

BY MR. NORTH:

Q. Just generally, describe what these conversations were, the topics of these conversations. 02:22:00

A. Yeah. The topics of the conversations were to update FDA on the current rates. We would always talk about the rates. We would talk about where we were in the investigation and any additional work that we were doing like feedback from 02:22:17 physicians or any internal testing that we were doing, we would share that with the -- I would share that with the FDA.

Q. Now, there has been a reference, I think you just referenced it, to the SIR guidelines?

A. Yes. 02:22:35

Q. What are those?

MR. O'CONNOR: Objection, Your Honor. Lack of foundation. This is not a medical doctor.

THE COURT: You just have to state the objection. Sustained. You have to lay foundation for that. 02:22:43